

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**AMIR KAKI, M.D.,** *an individual,*  
and **MAHIR ELDER, M.D.,** *an individual,*

Plaintiffs,

vs.

Case No.: 20-cv-10004  
Hon. Arthur J. Tarnow  
Mag. David R. Grand

**TENET HEALTHCARE CORPORATION,**  
*et al.*

Defendants.

\_\_\_\_\_ /

**STIPULATION REGARDING SETTLEMENT FUNDS**

The parties to this Stipulation Regarding Settlement Funds, by and through their respective counsel, stipulate to the following:

1. Plaintiff, Mahir Elder, M.D., and the Defendants have reached a resolution regarding Dr. Elder's share of damages and pro rata costs pursuant to the Arbitration Award.
2. Although Elder and Defendants have reached a resolution, and Elder agrees that the Arbitration Award has been satisfied by Defendants, to date no funds have been disbursed from Defendants to Elder.
3. Elder and Defendants agree that Defendant, Tenet Healthcare Corporation, will hold and escrow in an amount exceeding the total amount of the

awarded costs (\$110,673.01) plus thirty-eight percent (38%) of the settlement amount.

4. Elder and Defendants agree that the amount escrowed by Tenet will not be disbursed until the fee dispute between Elder and Deborah Gordon Law has been resolved or a court orders otherwise.

Dated: March 22, 2021

/s/ Mohammed Abdrabboh (with permission)

Mohammed Abdrabboh  
MAF Law  
Attorney for Plaintiff Mahir Elder, M.D.  
1360 Porter  
Dearborn, MI 48124  
(313) 582-5800  
mabdrabboh@hotmail.com

Dated: March 22, 2021

/s/ Charles N. Ash, Jr.

Charles N. Ash, Jr. (P55941)  
Matthew T. Nelson (P64768)  
Conor B. Dugan (P66901)  
Warner Norcross + Judd LLP  
Attorneys for Defendants  
150 Ottawa Ave. N.W., Suite 1500  
Grand Rapids, MI 49503  
T: (616) 752-2000 | F: (616) 752-2500  
cash@wnj.com  
mnelson@wnj.com  
conor.dugan@wnj.com

Thomas R. Paxton (P36214)  
Jaclyn E. Culler (P83220)  
Ogletree, Deakins, Nash,  
Smoak & Stewart, PLLC  
Attorneys for Defendants  
34977 Woodward Avenue, Suite 300  
Birmingham, MI 48009  
T: (248) 593-6400 | F: (248) 283-2925  
thomas.paxton@ogletree.com  
jaclyn.culler@ogletree.com

Benjamin W. Jeffers (P57161)  
Hickey Hauck Bishoff & Jeffers, PLLC  
Attorney for Defendants  
One Woodward Avenue, Suite 2000  
Detroit, MI 48226  
T: (313) 964-8600  
[bjeffers@hhbjs.com](mailto:bjeffers@hhbjs.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on March 22, 2021, I electronically filed the foregoing pleading with the Clerk of the Court using the ECF filing system, which will send notification of such filing to all ECF participants.

/s/ Charles N. Ash, Jr.